## THE LAW OFFICES OF ANDREW J. FRISCH, PLLC

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May 22, 2017

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ADMITTED IN NEW YORK, VIRGINIA
AND THE DISTRICT OF COLUMBIA
OF COUNSEL

ByFAX (046) 304-0352

The Honorable Arthur D. Spatt United States District Judge Eastern District of New York 100 Federal Plaza Central Islip, New York 11722

> Re: United States v. Adam Manson Criminal Docket Number 13-453 (ADS)(AKT)

Dear Judge Spatt:

On behalf of Adam Manson in the above-referenced case, I submit this letter as an application that the Court permit substitution of the property securing Mr. Manson's bond. Assistant U.S. Attorney Christopher Cafferone has advised me that he consents to this application.

As ordered by Magistrate Tomlinson on August 1, 2013, Mr. Manson's bond is currently secured by a house owned by his father at 3 Windsor Drive in Old Westbury, New York, and a corresponding judgment of \$500,000 filed against that property. Mr. Manson's father is about to sell that property. Meanwhile, Mr. Manson's father has bought (and owns free and clear of any mortgage) a condominium in North Hills, New York, valued in excess of \$500,000. We wish to substitute the condominium in North Hills for the house in Old Westbury and file a \$500,000 judgment against it to secure Mr. Manson's bond.

Thus, with the government's consent, I respectfully request that we be permitted to substitute the condominium in North Hills for the house in Old Westbury and file a judgment for \$500,000 as continued security for Mr. Manson's bond.

Respectfully submitted,

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Andrew J. Frisch

cc: AUSA Chris Caffarone